

Response to Economic Impact Analysis

Section 54.1-3505 of the Code of Virginia obligates the Board of Counseling to “promulgate regulations establishing requirements got evidence of continued competency as a condition of renewal of a license.” In proceeding with this effort there were a number of things that the Board considered:

1. Continuing competency requirements for license renewal in other states as well as what is considered the national standard set by the profession for continued competence. The 20 hours required by the proposed regulation are well within the parameters of what other licensing boards require and meets the national standard.
2. Hardship for licensee to obtain the twenty hours. The Board recognized that the counseling profession is broad and that licensees have a wide variety of interests in the pursuit of additional training. We were also cognizant that complications of life and work situations might make obtaining these hours more difficult for some licensees. While structured coursework with some sort of examination might be the best way to assure that learning has taken place, much training in our profession has always been done in other venues such as workshops, group supervision, and other experiential formats etc. that do not have an examination component, but do provide professional with important learning experiences. By allowing for a large range of both face to face and on-line activities, we feel that licensees will have the greatest ability to tailor learning to areas that interest them and therefore will be more likely to have meaning for their professional practice without unnecessary hardship for their personal lives.
3. Financial hardship. Throughout the open board meeting process of deciding on these proposed regulations, as well as the public comment periods, both licensees as well as their professional organizations, have had the opportunity to comment on this proposal. As these are the individuals who would be most financially impacted, we would expect any concern to have come to the Board’s attention. As the number of proposed hours is considered to be the national standard by the profession, there has been no negative comment. Most committed professional who are practicing are probably already obtaining these continued education hours for other certifications, and there will not be any additional financial impact for them
4. Inactive Licensure. The purpose of inactive licensure is to provide some additional options to those licensees who, due to life situations and circumstances, are suspending their practice for a short window of time with the intention of returning to practice. This option lessens the financial burden of license renewal fees during that time period they are not practicing. This new option will allow licensees to choose which option (inactive status or not renewing) best meets their personal needs at the time. At the same time, the continued competency requirement for reactivation gives some assurance to the Board that the same level of continued professional education has been met as other licensees.